Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Telephone Number Portability	)	CC Docket No. 95-116
	)	

COMMENTS OF THE FRONTIER AND CITIZENS ILECS

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The Frontier and Citizens Incumbent Local Exchange Carriers[1] (**"Frontier"**) urge the Commission not to shorten the wireline-to-wireless porting interval as proposed in the September 16, 2004 Second Further Notice of Proposed Rulemaking (**"NPRM"**). The North American Numbering Council (**"NANC"**) Report on which the NPRM is based is logically flawed and internally inconsistent. If adopted, the proposals would produce, at vast and unreasonable expense, much less of a timesavings than the Report claims and would create unacceptable customer confusion. At best, the C2/A3 proposal is a work in progress. It is far from ready to be a mandatory standard.

I. The C2/A3 Process Would Save Only A Maximum of One Business Day, Not 43 Hours.

The C2/A3 proposal in the NANC report does not produce a maximum porting interval of 53 hours. At most, this proposal would reduce the maximum porting

[1] The Frontier and Citizens Incumbent Local Exchange Carriers serve approximately 2.4 million access lines in 24 states, under the common ownership of Citizens Communications Company (NYSE: CZN).

interval by one business day, i.e., from four to three business days.

Without Early Morning Activation, which is outside the scope of the C2/A3 proposal, C2/A3 would work as follows for a best-case timesaving for a flow-through port:

- Porting LSR sent 9:00 a.m. Monday with due date of Friday 9:00 a.m.
- Mechanized response at 2:00 p.m. Monday with due date as requested (proposal C2).
- New Service Provider sends subscription version to NPAC 2:01 p.m. Monday.
- Old Service Provider sends subscription version to NPAC 11:59 p.m. Wednesday.
- NPAC notifies New Service Provider of Old Service Provider subscription version 11:59 p.m. Wednesday.
- New Service Provider sends modification order to NPAC changing due date and time for immediate activation at Thursday 9:00 a.m. (no greater than 24 hours prior to original due date per Proposal A3).
- Customer immediately starts receiving calls through New Service Provider Thursday 9:00 a.m.

The only time saved in the process is one business day, or 24 hours.

The New Service Provider could save additional time by using the Early Morning Activation process and activating the port at 12:01 a.m. on Thursday, an additional savings of 9 hours. However, under the existing process the New Service Provider can already do exactly the same thing at 12:01 a.m. on Friday, for an identical savings of 9 hours. Early Morning Activation produces no savings compared to current porting intervals, because the Early Morning Activation process is identical in the current and proposed new processes. However, the NPRM at ¶10 appears erroneously to claim the savings from Early Morning Activation as a result of the C2/A3 process and therefore as a savings comparing the C2/A3 process to the current 4 business day process.

There are no savings of 43 hours, as claimed in the table on page 21 of the Report. The savings are 24 hours, or more properly stated, one business day or 12 business hours. Neither is the "New max porting interval" equivalent to 53 hours, as claimed on page 21 of the Report. The example above shows that the new maximum porting interval for orders that flow though is 72 hours, or more properly stated, three business days or 36 business hours. In addition, for orders that do not flow through, the new maximum porting interval is the same as the old maximum porting interval – four business days.

Even through the use of Early Morning Activation, which as shown above is irrelevant in the calculation of savings, in the example above the total savings are only 33 hours with C2/A3 plus Early Morning Activation, not 43 hours, and the 9 hours saved by Early Morning Activation are not a savings compared to the present process. There is no way to achieve through the C2/A3 process an improvement in the intermodal porting interval of 43 hours compared to current processes.

Even the example of the new process in the NPRM, including Early Morning Activation, does not produce either a savings of 43 hours or a "maximum porting interval" of 53 hours. The example at ¶9 of the NPRM yields an interval of 63 hours, 10 hours longer than the proposed maximum porting interval and a savings of only 33 hours. Furthermore, using Early Morning Activation under the current process could, as discussed above, achieve 9 hours of the alleged savings of 33 hours. Thus, the example at ¶9 only produces a savings of 24 hours, or one business day, compared to the current process with Early Morning Activation.

The C2 process by itself does not actually save any hours that would be visible to the end user. Although the interval for responding to a porting order would be shortened from 24 to 5 hours, this 19-hour difference does not change the due date of the port, which remains Friday for a Monday port request. If the NANC report is making a claim of a 19-hour reduction in the porting interval resulting from the C2 process, this claim is erroneous. C2 would be a process change only, not a change in the time that a port will actually occur. The only potential overall savings occur in the A3 process, in which the new carrier is permitted to change the due date and time of the order no earlier than 24 hours prior to the specified due date. This produces a maximum savings of 24 hours, and may produce much less or no savings at all.

The NANC Report is also inconsistent in its use of hours. Although footnote 2 on page 21 recognizes that hours are "related" to business days, the proposed standard is a "max porting interval" of 53 hours. Not only is this interval unachievable even for flow-through ports as discussed above, it also fails entirely to recognize the concept of business days. If the Commission were to adopt a 53 hour standard, or even a 72 hour standard (three days) for flow-through orders without recognition of the concept of business days, a porting order placed on Friday afternoon prior to a Monday holiday would be due on the holiday weekend. Orders placed on Thursday would be due on Saturday or Sunday. A standard based on pure hours would require wireline LECs to fully staff for porting activities on weekends and holidays, a very large cost not even suggested in the NANC Report.[2] If the Commission were to establish a standard based

[2] The ILECs would have to staff carrier service personnel as well as the technicians necessary to work the orders.

on C2/A3, which it should not, the appropriate interval would be three business days for flow-through orders only, with the option of Early Morning Activation.

II. The C2/A3 Process Would Create Unacceptable Customer Confusion and Would Likely Be Ignored.

The NANC Report recognizes that some, and perhaps many, orders would "drop out" during the flow-through process. The savings from the C2 proposal apply only "[t]o the extent that the mechanized interface obviates the need for the order to be retyped manually on the receiving end" and further requires "receipt of an error-free order."[3] In Frontier's experience, a substantial percentage of number porting orders contain errors, some of which might be corrected manually by Frontier personnel, but none of which would allow the order to flow through an automated system.

It would be rash, at best, for a new carrier to guarantee to each customer that the new carrier will submit an error-free order and that the old carrier's systems will flow it through without manual intervention. As a result, the only way that the C2/A3 process could reasonably be explained to a customer would be for the new carrier to say, "I hope that your number will be ported in three days, but realistically it may take four days." The customer's response would no doubt be bewilderment if not anger, because the customer must now prepare herself for service to be transferred on either of two days, a great inconvenience. As a result, the new carrier and the customer would both be likely to decide that they would be better off with an interval that does not depend on so many potential points of failure. They would, in fact, stick with the four-day interval. In the example above, the new carrier would simply not change the due date at 9:00 a.m. on

[3] NANC Report, page 16.

Thursday, which is optional in the A3 process. As a result, the port would take place as scheduled on Friday, and the entire C2/A3 process would not produce any timesavings whatsoever.

III. The Costs of Flow-Through Systems To Implement Proposal A2 Would Be Vastly Greater Than the Benefits.

The NANC Report examined only the costs of the systems to 10 major carriers.[4] Frontier was not one of these carriers. Frontier does not have Operational Support Systems (OSS) that would be capable of automating the flow-through of number porting orders and responses. Frontier would have to create the OSS. Attached, as **Exhibit A**, is Frontier's estimate of the costs of implementing Proposal A2. Frontier's costs would exceed $1.4 million of one-time costs, plus more than $450,000 in annual recurring costs. These costs would be significantly larger if ILECs were required to provide 24 hours per day, 7 days per week support for the mechanized interface. Frontier has conservatively assumed that ILECs would be required to provide technical OSS support only during business hours. Frontier has also conservatively assumed that the Commission would retain the business day concept and that ILECs would not be required to submit NPAC create messages on weekends and holidays. If either of these assumptions is incorrect, the costs stated above should be increased by at least $50,000 in annual recurring costs for out-of-hours technical support and at least $50,000 in annual recurring costs for weekend and holiday staff to submit create messages.

It is reasonable to assume that Frontier experienced a burst of intermodal port requests in the initial months of the availability of intermodal portability, and that the

[4] Footnote 4 to the Table at NANC Report, p. 21.

average volume will tend to decrease, not increase, from the initial burst. Assuming that the total number of intermodal ports to date is a reasonable benchmark for the number of intermodal ports over the next three years, the cost of proposal C2 to Frontier is **nearly $1,300 for each intermodal port.** This per port amount exceeds by a wide margin the total revenue Frontier would expect to receive from a typical residential customer for an entire year.

Compared to these ruinous costs, the benefits would be miniscule. As discussed above, at best there would be a one-day decrease in the porting interval, and because error-free orders and perfect flow-though cannot be assumed, it is very likely that many, if not most, carriers and customers would stay with the existing 4-day interval rather than attempting to use a "maybe 3, maybe 4" interval. Assuming that half of the customers (or their carriers) opted not to risk the confusion, frustration and inconvenience of a two-day porting window, the $1,300 cost per port would double to $2,600 per port for each porting request in which a three-day interval would be possible. Assuming that one-fifth of the orders were to drop out of the automated system for one reason or another, the cost per intermodal port of Frontier customers actually benefiting from the three-day interval would rise to more than $3,200 per port. Frontier submits that the benefit of potentially shortening the porting interval from four days to three days for only a subset of intermodal porting requests is hardly noticeable in comparison to these massive costs.

If the Commission were to mandate proposal C2, Frontier would be spending several thousand dollars for each intermodal port that takes place in three days instead of four days. It might actually be less costly to require Frontier to hire a small army of

service representatives to do nothing but sit and wait for 24 hours a day, 7 days a week, for intermodal number porting requests to arrive, so that they could type the orders manually into Frontier's systems within five hours. The costs of the OSS and manual alternatives appear to be in the same order of magnitude. Neither alternative is in any way reasonable or justified by its potential benefits.

CONCLUSION

The Commission should not adopt Proposal C2/A3 or any of its alternatives. At best, the proposal would decrease the porting interval by only one day from four to three business day for orders that flow through. At worst, carriers and customers would ignore the process entirely because of the serious inconvenience of requiring customers to accept a 2-day window for the port to occur. In either case, the costs to a carrier in Frontier's position of creating the necessary OSS would be several thousand dollars for each port accelerated by one business day. The potential benefits of a one-day acceleration fail by a wide margin to justify the imposition of these costs.

Respectfully submitted,

FRONTIER AND CITIZENS ILECs

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EXHIBIT A

Estimate of cost to comply with FCC proposal
Reduced Intermodal Porting Interval

Summary of Estimated Cost

Initial Cost	$1,432,600
Yearly Recurring Cost	$474,500
3 Year Cost:	**$2,856,100**
Total # of Intermodal ports through Sept '04:	616
Cost per port over 3 years:	**$1,287.69**

Breakdown of Estimated Cost

ONE-TIME COSTS

Build GUI Web based front end & accept EDI orders	6500	
Modify billing systems for flow-through	3160	
Modify billing system to switch connection	480	
Infrastructure Support	1521	
Project Management	2535	
	14196	hours
	x $100/hr	
	$1,419,600	
Equipment	$13,000	

YEARLY RECURRING COSTS

Ongoing EDI Integration & update GUI	650	
Update LSOG Version	1000	
Modify billing systems for flow-through for new LSOG	600	
Customer Support	1220	
Infrastructure Support	475	
Project Management	800	
	4745	hours
	x $100/hr	
	$474,500	

Detail of Cost Estimates

ONE-TIME COSTS: LABOR

	Category	Analysis/ Design	Development	Testing	TOTALS
WEB APPS	EZLocal Functionality	500	1000	500	2000
	Integration	250	500	250	1000
	Rewrite existing LSR	250	500	250	1000
	CWMS Changes	125	250	125	500
	EDI integration for LSR	400	800	800	2000
CARS	CARS order creation	150	300	150	600
	Enhance WMS	100	200	100	400
	Integration	50	100	50	200
FDPI	Enhance WMS	150	300	150	600
	Enhance ConneXn	75	150	75	300
	DPI to Web apps feed	20	40	20	80
CDPI	Enhance WMS	150	300	150	600
	Enhance ConneXn	75	150	75	300
	DPI to Web apps feed	20	40	20	80
CONNEXN	Requirements Gathering	120			120
	Design	80			80
	Coding		120		120
	Testing			80	80
	Rollout to Production		80		80
				Subtotal	10140
Infrastructure Support					1521
Project Management					2535
				One-Time Cost: Labor TOTAL	**14,196** **hours**

ONE-TIME COSTS: EQUIPMENT

Servers	$8,000
cluster node	$5,000

YEARLY RECURRING COSTS: LABOR

	Category	Analysis/ Design	Development	Testing	TOTALS
WEB APPS	Ongoing Integration- EDI	150	300	200	650
	LSOG Version Compliance	250	500	250	1000
FDPI	Upgrade to next LSOG	50	100	50	200
CDPI	Upgrade to next LSOG	50	100	50	200
CARS	Upgrade to next LSOG	50	100	50	200
Carrier Svcs	External Documentation for EDI+GUI	80	300	40	420
	Manage EDI integration for new carriers				400
	On-call Customer Support				400
				Subtotal	3470
Infrastructure Support					475
Project Management					800
			Yearly Recurring Costs: labor TOTAL		**4,745** **hours**

CERTIFICATE OF SERVICE

CC Docket No. 95-116

Telephone Number Portability

I, Gregg C. Sayre, do certify that on November 16, 2004, the aforementioned Comments of the Frontier and Citizens ILECs were electronically filed with the Federal Communications Commission through its Electronic Comment Filing System, and were placed in the United States Mail, in the format noted below, with the appropriate postage affixed, to the following:

Sheryl Todd ***(3 paper copies)***
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